

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

IN RE: Michael Ahrens)	Case No.
)	
)	
Plaintiff)	COMPLAINT
)	
)	Judge:
)	
v.)	Magistrate:
)	July Demand Requested
)	
Law Offices of Bass & Associates)	
3936 E Fort Lewis, Suite 200)	
Tuscon, AZ 85712)	
)	
Defendant)	

Now comes Plaintiff, by and through his attorneys, and, for his Complaint alleges as follows:

INTRODUCTION

1. Plaintiff, Michael Ahrens, brings this action to secure redress from unlawful collection practices engaged in by Defendant, Law Offices of Bass & Associates. Plaintiff alleges violation of the Fair Debt Collection Practices Act, 15 U.S.C. Section 1692 et seq. ("FDCPA").
2. The FDCPA broadly prohibits any false, deceptive or misleading statements in connection with the collection of a debt. 15 U.S.C. Section 1692e.

JURISDICTION AND VENUE

3. This court has jurisdiction pursuant to 28 U.S.C. Section 1331, 1337, 1367; and 15 U.S.C. section 1692(d).
4. Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

5. Plaintiff, Michael Ahrens (hereinafter "Plaintiff") incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
6. Plaintiff is a resident of the State of Illinois.
7. Defendant, Law Offices of Bass & Associates ("Defendant"), is an Arizona business entity with an address of 3936 E. Fort Lowell Road, Suite 200, Tuscon, AZ 11735 operating as a collection agency, and is a "debt collector" as the term is defined by 15 U.S.C. Section 1692a(6).
8. Unless otherwise stated herein, the term "Defendant" shall refer to Bass & Associates.
9. At some point, the original creditor, transferred this debt to Defendant for debt collection.

ALLEGATIONS

10. The Plaintiff allegedly incurred a financial obligation in the approximate amount of \$2193.60 (the "Debt") to an original creditor (the "Creditor")
11. The Debt was purchased, assigned or transferred to Defendant for collection, or Defendant was employed by the Creditor to collect to Debt.
12. The Defendant attempted to collect the Debt and, as such, engaged in "communications" as defined in 15 U.S.C. Section 1692a(2).
13. On January 16, 2016, Plaintiff received a collection letter which showed their account number on the envelope. See Exhibit A.
14. The letterhead of said letter states "LAW OFFICES Bass & Associates A PROFESSIONAL CORPORATION." See Exhibit A.
15. Said letter is signed "Sincerely, Bass & Associates, P.C."
16. The letter is clearly part of a mass mailing, there is very little about the Plaintiff's unique debt listed.
17. This letter is clearly giving the Plaintiff a clear impression that the sender is an attorney.

18. This letter falsely implies that an Attorney has reviewed the creditor's claim.

19. "A debt collection letter on an attorney's letterhead conveys authority and credibility." Harrison vs. Wexler, 275 F.3d 642 (7th Cir. 2001).

20. The Defendant is a high volume collection agency and in fact there is no realistic way an attorney could have reviewed said letter sent to Plaintiff.

VIOLATIONS OF THE FDCPA-15 U.S.C. SECTION 1692, et seq.

21. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

22. The Defendant's conduct violated 15 U.S.C. Section 1692e in that it used false, deceptive, or misleading representation or means in connection with the collection of debt.

23. Plaintiff is entitled to damages as a result of Defendants' violations.

JURY DEMAND

24. Plaintiff demands a trial by jury.

PRAYER FOR RELIEF

25. Plaintiff demands the following relief:

WHEREFORE, the Court should enter Judgment in favor of Plaintiff and against Defendant for:

- (1) Statutory damages;
- (2) Attorney fees, litigation expenses and costs of suit; and
- (3) Such other and further relief as the Court deems proper.

Respectfully submitted,
/s/ John Carlin
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